

Responses to Comments Received October 23, 2003, from the Permittee for the Revised Preliminary Waste Discharge Requirements for the Sonoma West Holdings' Wastewater Treatment Facility

Note: The second comment period ended October 20, 2003, at 5:00 PM. These late comments were received on October 23, 2003.

1. Response to Comment One: Correction Regarding Runoff.

Comment noted and the correction was made. See Finding No. 8.

2. Response to Comment Two: Correction Regarding Effluent Filter.

Comment noted and the correction was made. See Finding No. 8.

3. Response to Comment Three: Process Wastewater Treatment System Correction.

Comment noted and the correction was made. See Finding No. 8.

4. Response to Comment Four: Domestic and Process Wastewater Disposed of on Bench No. 1.

Comment noted. The Permit describes the requirements for stormwater runoff from the benches in General Provisions J.29 and J.30.

5. Response to Comment Five: Water Reclamation Maximization Plan.

This Plan is intended to maximize the amount of wastewater reclaimed and irrigated and to minimize the amount of water discharged to surface water. The Plan can be structured as the Discharger sees fit to achieve these goals.

6. Response to Comment Six: BMP Manual.

Comment noted. The Discharger has been aware of the need to prepare a BMP manual since May 2003. If more than 90 days after adoption of the Permit is needed to prepare the BMP manual, an extension can be requested with a progress update. The BMP manual should be an extension and clarification of existing policies and procedures.

7. Response to Comment Seven: Discharge of Wastewater from the Benches.

Comment noted. Regional Water Board staff consider the difference between wastewater and stormwater in the context of Finding Nine to be clear. The Permit describes the requirements for stormwater runoff from the benches in General Provisions J.29 and J.30.

8. Response to Comment Eight: Authorized Discharge Locations.

Comment noted and the Permit has been corrected. See Findings 22-27.

9. Response to Comment Nine: California Toxics Rule (CTR) Effluent Limitations.

This comment seems to be referring to the calculation of the effluent limitations and the reasonable potential analysis. To calculate the reasonable potential for the discharge to violate or contribute to a violation of the applicable CTR fresh water criterion (criterion), the available sampling data are analyzed according to procedures outlined in the State Implementation Policy (SIP). If reasonable potential is established, effluent limitations are calculated, again using the SIP, and the applicable criterion. The sampling data are not used in the calculation of the effluent limitation, only in establishing reasonable potential. With only two sampling events to provide data for the reasonable potential analysis, an exceedance of the criterion clearly demonstrates a reasonable potential for the discharge to exceed the criterion, regardless of the time of year the sample was collected.

The SIP gives the separate Regional Water Boards the authority to allow for dilution in a mixing zone or not as their Water Quality Control Plans (Basin Plans) specify. The North Coast Region Basin Plan does not allow for a mixing zone.

10. Response to Comment Ten: CTR Effluent Limitations for Zinc.

Most of the CTR effluent limitations in this Permit are based on the fresh water criterion for protection of aquatic life due to chronic exposure. In those cases, the Average Monthly Effluent Limitation (AMEL) is lower than the criterion and the Maximum Daily Effluent Limitation (MDEL) is higher than the criterion. In the case of zinc, the effluent limitations are based on the criteria for protection of aquatic life due to chronic and acute exposure, both have the same value of 120 µg/L. Because aquatic life must be protected from acute exposure as well, both the AMEL (53.6 µg/L) and MDEL (107.5 µg/L) are lower than the criterion for acute exposure.

11. Response to Comment Eleven: Outfalls.

Comment noted and the Permit has been corrected. See Finding No. 9.

12. Response to Comment Twelve: Solid Waste Handling.

Solid waste must be handled properly and disposed of at a legal point of disposal. See Provision F. Solids Disposal and Handling Requirements for further details.

13. Response to Comment Thirteen: California Toxics Rule Requirements.

The discussion of the California Toxics Rule requirements in the Permit has been updated to reflect the work that the Permittee has completed.

14. Response to Comment Fourteen: Permit Omission of the Word “treated”.

Comment noted and the Permit has been corrected.

15. Response to Comment Fifteen: Clarification of Discharge Prohibition A.4.

This discharge prohibition has been modified to reflect authorized discharges of wastewater.

16. Response to Comment Sixteen: Prohibition of Waste Discharge within Treatment System.

This prohibition concerns spills, upsets and bypasses; not the treatment process.

17. Response to Comment Seventeen: Prohibition of Waste Discharge within Treatment System.

This prohibition concerns spills, upsets and bypasses; not the treatment process.

18. Response to Comment Eighteen: Influent Flow Rate.

Prohibition A.14 limits the influent flow rate.

19. Response to Comment Nineteen: Acute Toxicity Testing.

Acute toxicity testing is only applicable to the surface water discharge.

20. Response to Comment Twenty: BOD Monitoring.

The requirement for BOD monitoring prior to discharge to the treatment benches has been removed from the Permit.

21. Response to Comment Twenty-One: Total Coliform Sampling Location.

Samples shall be collected after the wastewater passes through the chlorine contact chamber.

22. Response to Comment Twenty-Two: Solid Waste Disposal.

The tenants of the Permittee can arrange individually to have their solid waste disposed of at a legal point of disposal. The Permittee, however, is responsible for knowledge of the disposal location and any enforcement actions related to this Permit.

23. Response to Comment Twenty-Three: New Tenant Requirements.

See Response to Comment Eight.

24. Response to Comment Twenty-Four: Water Recycling Requirements.

The Permittee has agreed to comply with the water recycling requirements included in the Permit.

25. Response to Comment Twenty-Five: Laboratory Testing.

The Permittee may perform the pH, turbidity and temperature testing. The Permittee shall have the proper equipment and retain the maintenance and calibration records for staff to view upon request.

26. Response to Comment Twenty-Six: Acute Toxicity Testing.

See Response to Comment 19.

27. Response to Comment Twenty-Seven: Toxicity Reduction Evaluation.

There is EPA guidance available for these documents. Staff is available to answer questions.

28. Response to Comment Twenty-Eight: Monitoring Frequency.

The monitoring frequency has been reduced as requested. Please see the Monitoring and Reporting Program.

29. Response to Comment Twenty-Nine: Monitoring the Discharge to the Benches.

The monitoring required for discharge to the benches has been removed from the Permit.

30. Response to Comment Thirty: Monitoring Redundancy.

As the monitoring requirements for discharge to the treatment benches has been removed, monitoring the wastewater in storage is not redundant.

31. Response to Comment Thirty-One: Monitoring Receiving Water.

The receiving water monitoring locations have been reduced as requested. Please see the Monitoring and Reporting Program.